

May 6, 1996

Rani Iyer  
County of Los Angeles  
Department of Public Works  
900 South Fremont Ave  
Alhambra, California 91803-1331

Dear Mrs. Iyer:

Closure Permit Number 6327b, 61098  
Facility Location 12300 Wittier Boulevard, Whittier

In response to your letter dated March 26, 1996 Laidlaw, working under the direction of Union Pacific Railroad Environmental Management, has reviewed the following documents.

- o California Underground Storage Tank Regulations
- o Lawrence Livermore National Laboratory Report

Our interpretation of these documents indicates no further action is warranted for this site. The reasons for this are listed below and detailed in the following sections.

- o None of the four conditions described in Title 23, Division 3, Chapter 16, Section 2724 exist at this site.
- o Passive bioremediation at this site is acceptable.
- o No mobile fuel constituents have been detected in this area of the site.

**Title 23, Division 3, Chapter 16, Section 2724**

This section of the regulations details four conditions which, if present, require further investigation. The following presents the four conditions and our reasons why we believe they do not exist at this site.

1) There is evidence that surface water or groundwater has been or may be affected by the unauthorized release.

*The remaining TPH concentrations are at three feet below grade eliminating the potential for surface water impacts. Additionally, the groundwater is greater than 40 feet below the surface, eliminating the potential for impacts.*

2) Free product is found at the site where the unauthorized release occurred or in the surrounding area.

*Free product was never suspected or detected during this investigation/remediation.*

3) There is evidence that contaminated soils are or may be in contact with surface water or groundwater.

*There is no evidence to support this. The evidence suggests the contaminated soils are not in contact with surface water or groundwater.*

4) The regulatory agency requests an investigation, based on the actual or potential effects of contaminated soil or groundwater on nearby surface water or groundwater resources or based on the increased risk of fire or explosion.

*The data indicate the soil containing residual hydrocarbon contamination is three feet below grade, not in contact with the surface, and not close to the groundwater. No increased risk of fire or explosion exists at this site.*

#### **Lawrence Livermore National Laboratory Report**

The Lawrence Livermore National Laboratory (LLNL) recently issued a report to the State of California detailing the wasted time and money remediating contaminated soils similar to those remaining on this site. This report indicates soils with hydrocarbon contamination should be remediated using passive bioremediation unless an increase in risk results from the presence of the contaminated soil.

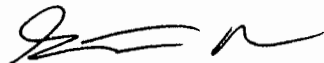
Further, the impacted soils remaining on site are all below 200 mg/kg, except one at 478 mg/kg, and contain no volatile fraction. The sample registering 478 mg/kg was also analyzed for Base Neutral Acid Extractables (EPA 8270) which resulted in all Non-Detectable concentrations. Additionally, data recovered during the pre-tank removal investigation by Hunter/Gregg demonstrates the lack of BTEX constituents.

### **Closing Statements**

Laidlaw and Union Pacific Environmental Management believe no further activity is warranted at this site. Recent improvements in understanding the potential ecological and environmental impacts resulting from hydrocarbon impacted soils suggest no further action is the best remedial strategy for this site.

We urge your office to re-evaluate your position with respect to this site. If you have any questions, or require any additional information, please don't hesitate to call me at (303) 938-5535. We will call you in two weeks to discuss this site.

Sincerely,



Stephen R. Brinkman  
Project Manager USPCI

cc: Harry Patterson UPRR  
Pat Spieles USPCI \ Laidlaw